

June 30, 2005

Ms. Marlene H. Dortch, Secretary  
Federal Communications Commission  
445 Twelfth Street, S.W., Room TW-B204  
Washington, D.C. 20554

Re: Grant Broadcasting System II, Inc.  
WFXR-DT, Roanoke, Virginia (Facility ID No. 24813)  
MB Docket No. 03-15  
Request for Waiver and Extension of DTV  
Maximization Interference Protection Deadline

Dear Ms. Dortch:

Grant Broadcasting System II, Inc. (the "Company"), the licensee of television station WFXR-TV, Roanoke, Virginia ("WFXR"), by its attorneys, hereby submits this request for a waiver and a six month extension of the July 1, 2005 "use-it-or-lose-it" maximization deadline for WFXR established in the Commission's September 7, 2004 *Report and Order* in MB Docket No. 03-15.<sup>1</sup>

The Company is also the licensee of television station WJPR(TV), Lynchburg, Virginia ("WJPR"). WJPR operates as a satellite of WFXR. The Roanoke-Lynchburg, Virginia DMA is ranked as the number 67 market by Nielsen.<sup>2</sup> WFXR and WJPR are affiliates of the Fox Broadcasting Company. WFXR operates on analog Channel 27 and has filed a channel election for a tentative DTV channel designation on Channel 17. WJPR operates on analog Channel 21 and has filed a channel election for a tentative DTV channel designation on Channel 20. By *Public Notice* dated June 23, 2005 (DA 05-1743), the Media Bureau tentatively granted each station's digital channel election.

In the DTV Order, the Commission generally established a July 1, 2005 construction deadline for stations in markets 1-100 that are affiliated with the top-four networks to retain interference protection within their maximization service areas.<sup>3</sup>

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<sup>1</sup> *Second Periodic Review of the Commission's Policies Affecting the Conversion to Digital Television*, 19 FCC Rcd 18279 (2004) (the "DTV Order").

<sup>2</sup> *Television & Cable Factbook 2005*, p. C-40.

<sup>3</sup> DTV Order at ¶¶ 3 and 78. All other stations have a July 1, 2006 deadline.

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Satellite stations (including WJPR) are subject to special rules and are not subject to this deadline.<sup>4</sup> The Commission also recognized that some stations would be unable to provide the required service by the deadline due to “severe financial constraints” or other circumstances beyond a station’s control.<sup>5</sup> Accordingly, the Commission adopted a waiver process for the granting of 6-month extensions of its DTV “use-it-or-lose-it” maximization deadline.<sup>6</sup>

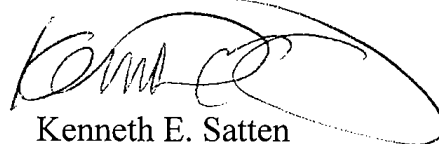
The Company’s instant request for a waiver and a six month extension of the July 1, 2005 deadline for WFXR is based on “severe financial constraints.” These financial constraints are described in Exhibit 1 which is being filed under separate cover with a request for confidential treatment based on the fact that the financial information provided is proprietary and not customarily disclosed to the public.

The Company has also by separate letter requested a renewal of Special Temporary Authority (“STA”) to operate WFXR-DT with low power facilities. The initial request for this STA was granted on September 25, 2003 (FCC File No. BDSTA-20030826AQS) and has been subsequently renewed.

Any questions regarding this request for a waiver and a six month extension of the July 1, 2005 deadline should be directed to the undersigned.

Sincerely,

WILKINSON BARKER KNAUER, LLP



By: Kenneth E. Satten

cc: Rick Chesson  
Shaun Maher

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<sup>4</sup> *Id.* at ¶ 104.

<sup>5</sup> *Id.* at ¶¶ 83 and 87.

<sup>6</sup> *Id.*